

DMB:MCF:pak

ORIGINAL

FILED
HARRISBURG

JAN 3 - 2001

JUHSSEN HONG,
Petitioner,

v.

CHARLES ZEMSKI, District
Director, INS, et al.,
Respondents.

) Civil No. 1:CV-00-2151 MARY E. D'AMOREA, CLERK

)

) (Judge Caldwell)

) (Magistrate Judge Blewitt)

)

)

)

)

Per _____
DEPUTY CLERKMOTION FOR ENLARGEMENT OF TIME

COMES NOW, the United States of America, by its attorneys, David M. Barasch, United States Attorney for the Middle District of Pennsylvania and Mary Catherine Frye, Assistant United States Attorney, who files this Motion for Enlargement of Time and, in support thereof, respectfully represents to the Court the following facts:

1. On December 15, 2000, the Petitioner filed a Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241.
2. On December 15, 2000, the Court issued an Order to Show Cause directing the Clerk of Court to serve the petition and a response by the respondents due on January 4, 2001.
3. On January 2, 2001 undersigned counsel was advised by the Immigration and Naturalization Service of the petition filed and response due. The United States Attorney's Office has no record of being served by the Clerk of Courts.

4. The petition was received from the Clerk of Courts via facsimile in the United States Attorney's Office on January 3, 2001.

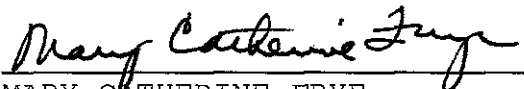
5. The undersigned did not seek petitioner's concurrence because Juhsen Hong currently is incarcerated and is proceeding pro se.

5. The petitioner's claim will not be prejudiced by this short continuance.

WHEREFORE, it respectfully requested that the Court grant a 20 day extension of time to respond to this petition.

Respectfully submitted,

DAVID M. BARASCH
United States Attorney


MARY CATHERINE FRYE
Assistant United States Attorney

Date: Jan. 3, 2001

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JUHSEN HONG,) Civil No. 1:CV-00-2151
Petitioner,)
) (Judge Caldwell)
v.) (Magistrate Judge Blewitt)
)
CHARLES ZEMSKI, District)
Director, INS, et al.,)
Respondents.)

CERTIFICATE OF SERVICE


The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That this 3rd day of January, 2001 she served a copy of the attached

MOTION FOR ENLARGEMENT OF TIME

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

ADDRESSEE(S):
Juhsen Hong, Reg. No. 0000557
Snyder County Jail
600 Old Colony Road
Selinsgrove, PA 17870-8610


PATRICIA A. KOLONOSKI
Legal Secretary